

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

COBBLESTONE WIRELESS, LLC,	§	
<i>Plaintiff,</i>	§	
	§	
v.	§	
T-MOBILE USA, INC.	§	CASE NO. 2:22-cv-00477-JRG-RSP
<i>Defendant,</i>	§	(Lead Case)
NOKIA OF AMERICA CORPORATION,	§	
ERICSSON INC.	§	JURY TRIAL DEMANDED
<i>Intervenors.</i>	§	
COBBLESTONE WIRELESS, LLC,	§	
<i>Plaintiff,</i>	§	
	§	
v.	§	
AT&T SERVICES INC.; AT&T	§	CASE NO. 2:22-cv-00474-JRG-RSP
MOBILITY LLC; AT&T CORP.,	§	(Member Case)
<i>Defendants,</i>	§	
NOKIA OF AMERICA CORPORATION,	§	JURY TRIAL DEMANDED
ERICSSON INC.	§	
<i>Intervenors.</i>	§	
COBBLESTONE WIRELESS, LLC,	§	
<i>Plaintiff,</i>	§	
	§	
v.	§	
CELLCO PARTNERSHIP d/b/a	§	CASE NO. 2:22-cv-00478-JRG-RSP
VERIZON WIRELESS,	§	(Member Case)
<i>Defendant,</i>	§	
NOKIA OF AMERICA CORPORATION,	§	JURY TRIAL DEMANDED
ERICSSON INC.	§	
<i>Intervenors.</i>	§	

**DEFENDANTS' AND INTERVENORS' UNOPPOSED MOTION FOR LEAVE TO
TAKE DEPOSITION AFTER THE FACT DISCOVERY DEADLINE**

Defendants and Intervenor (collectively, “Defendants”) hereby move the Court for leave to conduct one third-party deposition after the fact discovery deadline. Plaintiff has indicated that it does not oppose this motion.

The fact discovery deadline was May 17, 2024. Due to scheduling issues, the Defendants and the third-party were unable to schedule this deposition before the close of fact discovery. The Defendants and the third-party have agreed to the following additional deposition (the timing of which Plaintiff does not oppose):

Deponent	Date
Allied Inventors, LLC and Empire Technology Development LLC	May 29, 2024

To ensure the timely progression of the case, Defendants do not ask that the fact discovery deadline be moved in its entirety. Defendants also do not ask for a change to the deadline for expert reports. Instead, Defendants ask that leave be granted to take the foregoing limited discovery. Defendants are not seeking leave for purposes of delay.

DATED: May 23, 2024

Respectfully submitted,

/s/ David S. Frist

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CERTIFICATE OF CONFERENCE

I hereby certify that counsel for Plaintiff conferred with counsel for Defendant, and this motion is unopposed.

/s/ David S. Frist
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CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was served electronically on May 23, 2024, on all counsel of record who are deemed to have consented to electronic service via the Court's CM/ECF system per Local Rule CV-5(a)(3).

/s/David S. Frist
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